

EXHIBIT 81

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR
MDL No. 3047

This Document Relates To:

Tucson Unified School District
v. Meta Platforms Inc., et al
Case No. 4:24-cv-1382

VIDEOTAPED 30(b)(6) DEPOSITION OF
TUCSON UNIFIED SCHOOL DISTRICT
BY AND THROUGH
JULIE A. SHIVANONDA

Held At: JW Marriott Tucson
Starr Pass Resort & Spa
3800 W. Starr Pass Blvd
Tucson, Arizona

April 8th, 2025
2:02 p.m.

Reported By:

MAUREEN O. POLLARD, CA CSR #14449, RDR

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1 middle school and high school, who is that?

2 A. Rebecca Carrier.

3 Q. And for all of those positions, are
4 all of those positions sort of there's just one
5 person in each position, or are they kind of
6 like the counselors where there other people in
7 those positions that you didn't talk to?

8 A. No, they are those of those
9 positions, correct.

10 Q. Okay. So apart from those people we
11 just talked about, anybody else other than
12 counsel that you spoke to to prepare for the
13 deposition?

14 A. I don't know if that was part of
15 preparation, but we did meet with an expert,
16 Dr. Hoover.

17 Q. What's his first name?

18 MR. CUTLER: You can answer.

19 THE WITNESS: I don't remember her
20 first name.

21 BY MS. DEGTYAREVA:

22 Q. Her first name.

23 And what type of expert is
24 Dr. Hoover?

25 MR. CUTLER: I'm going to object.

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1 Well, I guess if you know you can
2 answer that question. Go ahead.

3 THE WITNESS: So Dr. Hoover is an
4 expert in social emotional learning,
5 mental health, and she is from -- I don't
6 remember what college she's from, but she
7 was retained as an expert in the case, is
8 my understanding.

9 BY MS. DEGTYAREVA:

10 Q. So what was the purpose of your
11 meeting with Dr. Hoover?

12 MR. CUTLER: I'm going to object to
13 that to the extent it calls for privileged
14 communications.

15 BY MS. DEGTYAREVA:

16 Q. So, Ms. Shivanonda, unless your
17 counsel instructs --

18 MR. CUTLER: Yeah, I'll instruct you
19 not to answer the question.

20 BY MS. DEGTYAREVA:

21 Q. In terms of preparing for this -- to
22 testify about the topics that you were
23 designated for in this deposition, what did you
24 discuss with Dr. Hoover?

25 MR. CUTLER: Again I'm going to

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1 object that it's not part of deposition
2 preparation.

3 And I'll instruct you not to answer.

4 BY MS. DEGTYAREVA:

5 Q. So just to be clear, did you meet
6 with Dr. Hoover to prepare for the deposition?

7 MR. CUTLER: I think she answered
8 that.

9 Go ahead.

10 THE WITNESS: No. In terms of these
11 topics, in preparation was meeting with
12 stakeholders within the district. As part
13 of the larger context there was a meeting
14 that happened with Dr. Hoover.

15 MR. CUTLER: Which is separate from
16 this deposition, so I think the questions
17 are about the deposition preparation.

18 BY MS. DEGTYAREVA:

19 Q. Got it.

20 So in terms of preparation for the
21 topics that you were designated on for this
22 deposition, apart from the people we talked
23 about, and your counsel, anybody else that you
24 met with to prepare?

25 A. No.

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1 Q. I think you said that you also
2 reviewed some documents. What documents did you
3 review?

4 A. I reviewed this document to be in
5 preparation of the topics, as well as Plaintiff
6 Fact Sheet, as well as interrogatory documents.

7 Q. Did you review any internal TUSD
8 documents or documents from TUSD databases,
9 e-mail, anything that wasn't prepared for
10 purposes of the litigation specifically?

11 MR. CUTLER: Anything not prepared
12 specifically for the litigation.

13 THE WITNESS: I don't believe it was
14 not prepared for the litigation, no. This
15 was in preparation for the litigation.

16 BY MS. DEGTYAREVA:

17 Q. I'm sorry, maybe that was a poorly
18 worded question.

19 But apart from rog responses, the
20 PFS, and then the deposition notice, any other
21 documents you reviewed?

22 A. Yes. Internal documents.

23 Q. What internal documents did you
24 review?

25 A. Documents around practices in the